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Remarks

The Abstract has been amended to conform to Abstract requirement pointed out by Examiner.

Telephone Interview with Examiner on May 11, 2004.

Applicants thank Examiners for the telephone interview extended to their attorney, J. B. Kraft on May 11, 2004. As Applicants explained in that interview, the claims have been amended to emphasize what is the key to the present invention. The amendment has modified the scope of the claims to a status that their patentability should be considered with respect to the rejection of the claims as unpatentable under 35 U.S.C. 103(a) over Kiraly (US6,324,511). It should be noted that the elements of cancelled dependent claims 5, 17, and 29 have been respectively incorporated into in independent claims 1, 13 and 25. Since dependent claims 5, 17, and 29 have been rejected under 35 USC 103(a), we will consider all remaining claims thus rejected over the Kiraly under 35 USC 103(a).

Applicants Argument.

Accordingly, the rejection of claims 1-4, 6-16, 18-28, 30-36 under 35 U.S.C. 103(a) over Kiraly et al. (US6,324,511) is respectfully traversed.

While Kiraly like the present invention relates to providing computer display interfaces for the physically and visually impaired, Kiraly is not concerned with the creation or transmission of the Web pages of the present invention which have a plurality displayable modes determined by control tags in the markup language format. The user is enabled to display the received Web page in either a conventional mode or read the control tags and display the

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Web page in an alternate mode with a moving indicator for the physically impaired.

The present inventors have recognized that there are available application programs such that of Kiraly which convert text files stored on computer systems into files which have a variety of implementations for displaying the data in the files in modes which are more readily interactively accessed, understood, and otherwise related to by physically limited persons.

However, the contribution of the present invention is based upon the recognition that the Internet or World Wide Web usage has become so pervasive and integrated into everyday life and business that with an aging population, a relatively high number of Web users are likely to have physical or visual limitations. Thus, there is provided special control tags in the markup language of the created and transmitted Web page. Through the selective reading of these control tags, the receiving user is enabled to display the received Web page in several modes, at least one of which includes a moving indicator or guide for the physically impaired.

This represents a great convenience to the impaired Web user. He need not buy and install special application programs such as those of the Kiraly patent for providing display of files in a physically impaired display mode. Instead, according to the invention, the requested Web page arrives ready to be selectively displayed in the mode for the impaired user.

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Since, Kiraly relates to an application program for a computer system to convert files into display modes for the physically impaired, it does not disclose or suggest the following elements of the present invention:

- the control tags in the transmitted Web page enabling the Web page to be read at the receiving Web station; and
- means at the receiving station to read these control tags so as to display the received Web page in the moving indicator mode for the physically impaired

The Examiner relies on the description at col 9, lines 7-12 of Kiraly as teaching the application of the Kiraly display program for the physically impaired to Web documents and thus to the present invention. The Examiner notes that one source of the Kiraly display text is data from a Web document provided by the Internet Explorer Web browser. Applicants submit that the mere mention of a Web document does not suggest the present invention as described above. The Web document is cited as a source of displayable data as is the also cited source: text data from Microsoft Word. As shown in Fig. 4, (Kiraly) this text data then serves as the input data, step 410 which is then subject to the rest of the steps in the application program of Fig. 4 to produce the Kiraly display system for the physically impaired. There is nothing in steps 420-480 of Fig. 4 suggestive of reading Web page control tags for any purpose. In fact, one skilled in the Web page art would understand that if there were to be any reading of control tags, it would have to have been done in the Web browser i.e. the Internet Explorer prior to step 410, Fig. 4. Control tags in the markup language of a received Web page can only be read by the Internet or Web browser. There is no way that steps of Fig.

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4 could be modified to read the markup language control tags
in a Web page for any purpose.

In this respect, the Kiraly teaching would lead away
from the present invention. If control tags in the received
Web page could be read in the Internet Explorer to provide
the Web document mode for the physically impaired already
provided at step 410, what would be the need for the
remaining steps 420-480 of Fig. 4?

In connection with the Web page implementation of the
present invention, the Examiner points to col 5, lines 62-65
of Kiraly where it is set forth that the text display for
the impaired programs of Kiraly may be object oriented
programs such as Java or C, or C++. From this, the Examiner
concludes that one skilled in the art could then reasonable
substitute a markup language with tags.

Applicants submit that this would not be a reasonable
leap suggested by Kiraly. Applicants have set forth above
that the Kiraly application program as exemplified by Fig.
4, steps 410-480 could not be used to read or interpret a
Web markup document with control tags. The reading of
control tags can only be done in a Web browser such as the
Internet Explorer. However, if such a reading of control
tags were done in the browser, there would be need for the
program of Fig. 4, steps 410-480 which is the key to the
Kiraly teaching.

Claims 10-12, 22-24, and 34-36 may be further
distinguished over Kiraly in that they set forth that the
reading of the control tags which define the alternate
display for the physically impaired is carried out on a Web
browser program. As set forth above in Kiraly, the document
put out from the Web browser program (Internet Explorer) is
then subjected to the Kiraly application program, Fig. 4,
steps 410-480 for creating a display for the physically

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impaired. This would lead one skilled in the art to reason
that if the Kiraly application program (Fig. 4) provides the
alternate displayed Web page for the physically impaired,
there would be no need for reading control tags in the Web
document being processed by the Internet Explorer browser to
achieve the same result.

In view of the foregoing, claims 1-4, 6-16, 18-28, 30-
36 are submitted to be in condition for allowance, and such
allowance is respectfully requested

Respectfully submitted,

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